

Exhibit E

From: Miazad, Ossai <om@outtengolden.com>
Sent: Monday, February 26, 2018 6:09 PM
To: Engelman, Keri L.; Evans, Paul C.
Cc: Bentley, Cheryl-Lyn; McNerney, Christopher; Schrum-Herrera, Cristina; Michael Pope; Eric Eingold
Subject: RE: Millien et al v. The Madison Square Garden Company et al - Supplemental Production

Keri,

We appreciate the follow-up. We are however over half way through the discovery period without sufficient responses from MSG to key areas of discovery served many months ago.

On ESI, you previously agreed to produce a list of your proposed search terms and restrictions for our input. We have not received that information. We do not object to MSG running its keywords to generate a hit list to share with us. However, in our experience that list takes minutes to generate, not weeks. Please provide MSG's proposed search terms and restrictions immediately. We also ask that you expedite generating the hit lists, but not at the expense of providing the search terms to us for input.

Also pressing is the fact that we have not yet agreed to a process for selecting custodians. As we have always indicated, Plaintiffs would likely identify additional custodians. MSG still has not produced organizational charts that would allow Plaintiffs to have informed discussions about custodian selection. We ask that Defendant supplement its document production with organizational charts, including corporate level charts for the entire organization. We again request organizational charts for HR (and any sub-units, i.e. HR Systems and Operations group, HR Compliance Dept., HR Business Partner group; People Investment; People Acquisitions; People Practices), Legal and any other part of the organization that deals with or interacts with the background check process in any way. Please provide these organizational charts by Thursday, March 1. MSG previously identified only nine custodians. We requested the titles and basis for selection which MSG provided largely through supplemental interrogatory responses served on February 8, 2018. We still do not have this information for one of the nine custodians, Ms. Danahy. Please provide Ms. Danahy's job title and the basis for identifying her as a custodian. We would also like to confirm that for each selected custodian, you intend to collect emails from the current email system, in addition to the prior system.

We are still waiting on a response to our proposed compromise on information to be searched before the class period. This is an issue that we need to resolve immediately or take to the Court for guidance. Please get back to us by Wednesday, February 28th.

We also have not heard from you on the issue we raised about the documents MSG identified in the privilege log as privileged. Our position is that the content is not protected from disclosure. Please provide us with your position on the basis for the designation by Wednesday, February 28th.

Regards, Ossai

Ossai Miazad
646-825-9817

From: Engelman, Keri L. [mailto:keri.engelman@morganlewis.com]
Sent: Thursday, February 22, 2018 6:31 PM
To: Miazad, Ossai <om@outtengolden.com>; Evans, Paul C. <paul.evans@morganlewis.com>
Cc: Bentley, Cheryl-Lyn <cbentley@outtengolden.com>; McNerney, Christopher <cmcnerny@outtengolden.com>; Schrum-Herrera, Cristina <Cschrumerherra@outtengolden.com>; Michael Pope <mpope@youthrepresent.org>; Eric

Eingold <eingold@youthrepresent.org>

Subject: RE: Millien et al v. The Madison Square Garden Company et al - Supplemental Production

Ossai,

We wanted to circle back regarding some of the questions that you posed last week regarding MSG's document productions.

First, as to the ESI search protocol, we have collected many of the emails from the prior e-mail system for the identified custodians, and are loading those to the database to allow us to run our proposed keywords to generate a hit list that we will share with you for discussion. We expect that process to be completed within the next two weeks.

Second, as to the two applicant spreadsheets, the data collected from Sterling did not include any race data. We are in the process now of supplementing the Sterling applicant spreadsheets with race/ethnicity through applicant tracking and/or employee data maintained by MSG. We expect that process to take approximately three weeks given the volume of data, and will supplement our production once we receive it.

Third, the documents produced that are not accounted for in the privilege log are not redacted based on privilege. We will re-produce those documents to you without redactions next week. Based on MSG's investigation to date, it is not withholding documents based on privilege that have not yet been logged.

Fourth, we have not yet been able to resolve the issue with the meta-data in connection with documents pulled from the third-party Sterling and ICIMS systems. We will keep you updated as we learn more.

Please let us know if you would like to schedule a call to further discuss any of these issues.

Thanks,
Keri

Keri L. Engelman

Morgan, Lewis & Bockius LLP

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From: Miazad, Ossai [<mailto:om@outtengolden.com>]

Sent: Thursday, February 15, 2018 5:28 PM

To: Engelman, Keri L. <keri.engelman@morganlewis.com>; Evans, Paul C. <paul.evans@morganlewis.com>

Cc: Bentley, Cheryl-Lyn <cbentley@outtengolden.com>; McNerney, Christopher <cmcnerney@outtengolden.com>; Schrum-Herrera, Cristina <Cschrumherrera@outtengolden.com>; Michael Pope <mpope@youthrepresent.org>; Eric Eingold <eingold@youthrepresent.org>

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[EXTERNAL EMAIL]

Keri and Paul,

We still have not heard from you on MSG's proposed ESI search protocol or received an update on the status of document retrieval from Sterling and ICIMS. We discussed both during our January 25 meet and

confer and understood that you would be getting back to us in short order. We are also still waiting on a written response to our proposed compromise on information to be searched before the class period. We would appreciate if you could get back to us on these issues next week.

We did receive the two applicant spreadsheets. Prior to noticing a Rule 30(b)(6) deposition related to the applicant data, it would be helpful to know whether there is a data dictionary or similar document that could narrow the questions we would have on the fields within the database. I will also note that we requested race data which was not included in the spreadsheets and we would ask for that information to be supplemented.

Regards, Ossai



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From: Engelman, Keri L. [<mailto:keri.engelman@morganlewis.com>]

Sent: Wednesday, February 7, 2018 10:45 PM

To: Engelman, Keri L. <keri.engelman@morganlewis.com>; Miazad, Ossai <om@outtengolden.com>; McNerney, Christopher <cmcnerney@outtengolden.com>; Schrum-Herrera, Cristina <Cschrumherrera@outtengolden.com>; Michael Pope <mpope@youthrepresent.org>; Eric Eingold <eeingold@youthrepresent.org>

Cc: Evans, Paul C. <paul.evans@morganlewis.com>

Subject: RE: Millien et al v. The Madison Square Garden Company et al - Supplemental Production

All,

The password for the zip file containing the supplemental production is: @MorganLewis_PH_20180207.

The password for the native documents is: 123!

Thanks,
Keri

Keri L. Engelman

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From: keri.engelman@morganlewis.com [<mailto:keri.engelman@morganlewis.com>]
Sent: Wednesday, February 7, 2018 10:42 PM
To: om@outtengolden.com; cmcnerney@outtengolden.com; Cschrumherrera@outtengolden.com; mpope@youthrepresent.org; eeingold@youthrepresent.org
Cc: Evans, Paul C. <paul.evans@morganlewis.com>
Subject: Millien et al v. The Madison Square Garden Company et al - Supplemental Production

You have received 4 secure files from keri.engelman@morganlewis.com.

Use the secure links below to download.

All,

Enclosed please find: (1) a supplemental production bates labeled Millien_00000141-263; (2) supplemental answers to Plaintiffs' First Set of Interrogatories; (3) a letter dated February 7, 2018 regarding Defendants' Responses to Plaintiffs' First Set of Requests for Production of Documents; and (4) a privilege log.

Passwords to follow under separate cover.

Please let us know if you have any questions.

Thanks,
Keri

Secure File Downloads:

Available until: **09 March 2018**

Click links to download:

[02.07.2018 Letter from P. Evans.pdf](#)

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[Millien et al v. MSG Supplemental Answers to Interrogatories 02.07.2018.pdf](#)

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[Millien v. MSG Privilege Log 02.07.2018.pdf](#)

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